

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-130-E / 2019-51-E / 2018-401-E

IN RE:)	
)	
Ecoplexus Inc.)	
)	
Complainant,)	CONSENT MOTION TO EXTEND DEADLINES
)	
v.)	
)	
Dominion Energy South Carolina, Inc. (f/k/a South Carolina Electric & Gas Company,)	
)	
Defendant.)	

Pursuant to Commission Rule 103-829 and -831, Ecoplexus Inc. (“Ecoplexus”) and Dominion Energy South Carolina (f/k/a South Carolina Electric & Gas Company)(“DESC”) hereby submit this Consent Motion to Extend Deadlines to postpone all dates in the schedule issued in this matter by the Standing Hearing Officer Directive dated March 9, 2020 and all discovery in this matter for forty-five (45) days as a result of the disruption to business and legal matters due to COVID-19.

The Standing Hearing Officer Directive dated March 9, 2020 sets the schedule for procedural matters and hearings in this case as follows:

May 7, 2020	Oral arguments before the Commission regarding Motion to Dismiss
May 18, 2020	Discovery process ends
June 1, 2020	Ecoplexus prefile direct testimony
June 15, 2020	Other parties’ testimony

June 22, 2020	Ecoplexus rebuttal testimony
June 29, 2020	Other Parties' surrebuttal testimony
July 15, 2020	Hearing at 10:00.

Additionally, DESC served its First Set of Discovery Requests on Ecoplexus on March 30, 2020, and responses from Ecoplexus are due to DESC on April 20, 2020.

Due to the COVID-19 pandemic, the parties are working remotely with limited staff and resources. As a result, both parties are substantially hindered in conducting or responding to discovery and in adequately preparing for all other matters currently scheduled by the Standing Hearing Officer Directive. Accordingly, the parties request a forty-five (45) day extension for all dates in the Standing Hearing Officer Directive and a hold on all discovery, including responses currently due, for the same forty-five (45) days. The parties believe that the requested 45-day extension is reasonable under the current circumstances. Both parties agree not to serve or otherwise conduct any discovery in this matter until the 45-day period has ended on May 22, 2020.

The proposed revised schedule would be as follows:

May 22, 2020	Discovery to resume
June 4, 2020	Ecoplexus' Responses to DESC's First Set of Discovery Requests
June 22, 2020	Oral arguments regarding Motion to Dismiss to be rescheduled not before this date
July 2, 2020	Discovery process ends
July 16, 2020	Ecoplexus prefile direct testimony
July 30, 2020	Other parties' testimony
August 6, 2020	Ecoplexus rebuttal testimony
August 13, 2020	Other parties' surrebuttal testimony
August 31, 2020	Hearing to be rescheduled by the Commission not before this date

For the aforementioned reasons, Ecoplexus and DESC respectfully request that the Commission grant this Motion in its entirety.

WE SO CONSENT:

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Dated: April 8, 2020

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THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2019-130-E / 2019-51-E / 2018-401-E

IN RE:)	
)	
Ecoplexus Inc.,)	
)	Certificate of Service
Complainant,)	
)	
vs.)	
)	
South Carolina Electric & Gas,)	
)	
Defendant.)	
)	

This is to certify that I, Jeremy C. Hodges, have this date served one copy of Ecoplexus Inc.'s Consent Motion to Extend Deadlines in the above referenced matters to the person(s) named below by electronic mail, as shown below:

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Dated: April 8, 2020